

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEMETRIA POWELL, as guardian <i>ad</i>)	
<i>litem</i> and on behalf of her son D.P. et al.,)	
)	No. 18 CV 6675
Plaintiffs,)	Judge Joan B. Gottschall
)	
vs.)	
)	
The State of Illinois et al.,)	
)	
Defendants.)	

MOTION FOR CLASS CERTIFICATION

Plaintiff Demetria Powell, by her undersigned counsel, respectfully moves pursuant to Rule 23(b)(2), F.R.Civ. P. that this Court certify the class described in paragraph 7 of this complaint for the claims in this complaint, namely: “All African American children under the age of eighteen who live... in the City of Chicago and are: 1) disabled under the terms of the Americans with Disabilities Act on account of their exposure to gun violence; or 2) at risk of becoming disabled by their exposure to gun violence.” As set out in paragraph 8 of the complaint, the proposed plaintiff class satisfies all four requirements of Rule 23(a), F.R.Civ. P. Plaintiff seeks certification of this class pursuant to Rule 23(b)(2) F.R.Civ. P. because she seeks relief common to the class as a whole. In addition, the State of Illinois, the Governor, the Department of the Illinois State Police, and the Director of the Department of the Illinois State Police—hereafter the State defendants—have acted uniformly with respect to the class as a whole.

In further support of this motion, plaintiff submits an accompanying memorandum of fact and law.

Respectfully submitted,

Dated: November 21 2019

By: /s/ Thomas H. Geoghegan
One of Plaintiff's Attorneys

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